

The Honorable James L. Robart

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

TOP NOTCH SOLUTIONS, INC. and  
ROBERT RASHIDI,

**Plaintiffs.**

VS.

CROUSE AND ASSOCIATES  
INSURANCE BROKERS, INC. et al.

### Defendants.

NO. 2:17-CV-00827-JLR-MAT

STIPULATED MOTION AND  
[PROPOSED] ORDER FOR  
DISMISSAL WITH PREJUDICE OF  
PLAINTIFFS' CLAIMS AGAINST  
DEFENDANT CROUSE AND  
ASSOCIATES INSURANCE  
BROKERS, INC. AND OF CROUSE'S  
COUNTERCLAIM AGAINST  
PLAINTIFFS

### **Clerk's Action Required**

**Note on Motion Calendar:  
September 10, 2019**

## I. STIPULATED MOTION

Plaintiffs Top Notch Solutions, Inc., and Robert Rashidi (collectively, "Plaintiffs"), and Defendant Crouse and Associates Insurance Brokers, Inc. ("Defendant") hereby stipulate to the dismissal with prejudice without fees or costs to either party of any and all claims that were brought or could have been brought by Plaintiffs against Crouse. The Parties further stipulate to the dismissal with prejudice without fees or costs of Crouse's counterclaim against Plaintiffs. The claims alleged between Plaintiffs and Crouse have been fully settled by the Parties outside of court, and Crouse may be dismissed from this litigation with prejudice.

STIPULATED MOTION AND [PROPOSED] ORDER FOR  
DISMISSAL WITH PREJUDICE OF PLAINTIFFS' CLAIMS  
AGAINST DEFENDANT CROUSE AND ASSOCIATES  
INSURANCE BROKERS, INC. AND OF CROUSE'S  
COUNTERCLAIM AGAINST PLAINTIFFS - NO. 2:17-CV-  
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Seattle, Washington 98101-3927  
(206) 292-9988

1 The Parties further request that the caption be amended to remove Crouse as a named  
2 defendant.

3 The claims against Defendants McGriff, Seibels & Williams, Inc., and the Law Offices of  
4 Pucin & Friedland, P.C., remain asserted and active against those Defendants. This Stipulated  
5 Dismissal is limited to Crouse only and does not waive or dismiss any claims against the other  
6 defendants remaining in this litigation.

7 RESPECTFULLY SUBMITTED this 10<sup>th</sup> day of September, 2019.

8 BRUCKER LAW OFFICE PLLC

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23 BETTS, PATTERSON & MINES, P.S.

24 By /s/ S. Karen Bamberger  
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35 STIPULATED MOTION AND [PROPOSED] ORDER FOR  
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38 INSURANCE BROKERS, INC. AND OF CROUSE'S  
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40 00827-JLR-MAT

1 E-mail: nkhachatourians@bpmlaw.com  
2 Attorneys for Defendant/Counterclaim-  
3 Plaintiff Crouse and Associates Insurance Brokers, Inc.

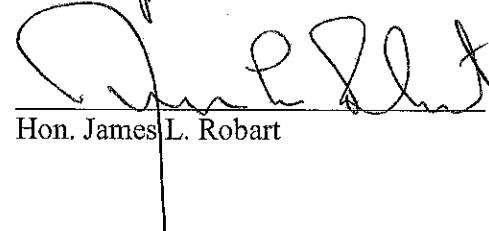
4 **II. PROPOSED ORDER**

5 This matter having come on for hearing upon Plaintiffs Top Notch Solutions, Inc., and  
6 Robert Rashidi (collectively, "Plaintiffs"), and Defendant Crouse and Associates Insurance  
7 Brokers, Inc. ("Crouse")'s, Stipulated Motion for Dismissal with Prejudice, and this Court being  
8 fully advised of the same, it is hereby ORDERED that all claims that were brought or could have  
9 been brought by Plaintiffs against Crouse are dismissed with prejudice and without fees or costs  
10 to either party.

11 IT IS FURTHER ORDERED that Crouse's counterclaim against Plaintiffs is hereby  
12 dismissed with prejudice and without fees or costs to either party.

13 As all claims between the Parties are resolved, and no other claims remain, Crouse is  
14 hereby dismissed from this litigation with prejudice. The Clerk is directed to amend the Case  
15 Caption and remove Crouse as a defendant.

16 IT IS SO ORDERED on this 12 day of Sept., 2019.

17   
18 Hon. James L. Robart  
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## CERTIFICATE OF SERVICE

I, Cynthia Daniel, hereby certify that on September 10, 2019, I electronically filed the following:

- Stipulated Motion for Dismissal with Prejudice; and
- Certificate of Service.

with the Court using the CM/ECF system which will send notification of such filing to the following:

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STIPULATED MOTION AND [PROPOSED] ORDER FOR DISMISSAL WITH PREJUDICE OF PLAINTIFFS' CLAIMS AGAINST DEFENDANT CROUSE AND ASSOCIATES INSURANCE BROKERS, INC. AND OF CROUSE'S COUNTERCLAIM AGAINST PLAINTIFFS - NO. 2:17-CV-00827-JLR-MAT

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1 DATED this 10<sup>th</sup> day of September 2019.

2 BETTS, PATTERSON & MINES P.S.

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4 By *s/Cynthia Daniel*  
5 Cynthia Daniel

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